

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET No. : 2020-188-T

Application of:)	
JEGA Movers, LLC)	MOTION FOR PERMISSION
For a Class E Household Goods Application)	TO PRESENT SHIPPER
Certificate of Public Convenience and)	WITNESS TESTIMONY BY
Necessity for operation of a Motor Vehicle)	AFFIDAVIT

Comes Now JEGA Movers, LLC ("Applicant") and moves for permission to present the testimony of its shipper witness by Affidavit. The Commission's regulation concerning the proof required to support an application for Certificate of Public Convenience and Necessity for a Class E mover of household goods with statewide authority is found in S.C. Code Regs. 103-333 (the Regulation).

Regarding the testimony of shipper witnesses, the regulation states:

PC&N (Household Goods or Waste for Disposal). An application for a Certificate of PC&N were to amend a Certificate of PC&N to operate as a carrier of household goods were hazardous waste for disposal by motor vehicle may be approved by a showing that the applicant is fit, willing, and able to appropriately perform the proposed service and that the public convenience and necessity are not already being served in the territory by existing authorized service. The public convenience and necessity criterion must be shown by the use of shipper witnesses, if the applicant applies for authority for more than three contiguous counties. If the commission determines that the public convenience and necessity is already being served, the commission may deny the application. The following criteria should be used by the commission in determining that an applicant for motor carrier operating authority is fit, willing, and able to provide the requested service to the public:

S.C. Regs. 103-133-1

In the interest of administrative economy (judicial economy in the administrative law context), the Applicant requests that the Commission allow the regulations requirement of use of a shipper witness" to be satisfied by the submission of an Affidavit.

The Office of Regulatory Staff (the only other party that the applicant in this Docket" would have the right to contest the adequacy of the Affidavit. Counsel for the Applicant has discussed this Motion with counsel for the ORS and the ORS does not object to the relief sought herein.

Therefore, Applicant respectfully requests the commission allow Applicant to present the testimony of its shipper witness by Affidavit. The Applicant attaches the Shipper Witness Affidavit of Leroy Williams as Exhibit 1 hereto.

Degenhart & Degenhart Law, LLC
s/ Paul V. Degenhart
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AFFIDAVIT

In Re:

Jega Movers, LLC

Docket No.: 2020-188-T

Household Goods Application

Profile Shipper Witness Testimony

The witness having been duly sworn states as follows:

My name is Leroy Williams.

I am over the age of 18 and competent to give this Affidavit.

I reside at 367 Fox Squirrel Circle, Columbia, SC 29209.

I own and am employed by Anytime Movers.

The company is engaged in residential and commercial moving.

I am presenting testimony today on behalf of JEGA Movers, LLC a Carolina Limited Liability Company Whose Application Is Pending before the Public Service Commission of South Carolina for a Class B (Household Goods Mover) Certificate of Public Convenience and Necessity.

Through my work I'm will aware of the need for another mover in the area requested by the applicant in this case.

I am familiar with the need because our company is routinely contacted and demand well outstrips supply for affordable, competent and trustworthy movers.

For example, it is always difficult to schedule a moving company month-end which coincides with the highest number of real estate closings taking place. In addition, many of our clients often complain about the high cost of movers and I believe having more moving companies in the greater Columbia area can help reduce and control costs.

I know there is a need for more movers in this geographical area.

I am familiar with the applicant in this case because we started in the business together nearly 20 years ago. We have remained friends and I am well aware that James Aaron and JEGA Movers, LLC provide competent, affordable and trustworthy service.

I am 100% confident that this applicant would be an excellent addition to the household goods movers in the State of South Carolina.

FURTHER AFFIANT SAYETH NOT.


Leroy Williams

Sworn to and subscribed before me

Cheyenne F Harper a Notary Public in and for the state of South Carolina

This 23rd day of November 2020.


Notary Public

My Commission Expires March 4, 2025

[Seal]

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DOCKET No. : 2020-188-T

Application of:)	
JEGA Movers, LLC)	
For a Class E Household Goods Application)	Certificate of Service
Certificate of Public Convenience and)	
Necessity for operation of a Motor Vehicle)	

This is to certify that I have caused to be served this day the Motion for Permission to present Shipper Witness Testimony by Affidavit by electronic mail service as follows:

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November 30, 2020